

Baker & Hostetler LLP

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Presentment Date: November 21, 2011

Time: 12:00 p.m.

Objections Due: November 21, 2011

Time: 11:00 a.m.

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

**NOTICE OF PRESENTMENT OF THE TRUSTEE'S MOTION TO FURTHER
AMEND, SOLELY AS RELATES TO WINDELS MARX LANE &
MITTENDORF, LLP, THE ORDER PURSUANT TO SECTION 78eee(b)(5) OF
SIPA, SECTIONS 105, 330, AND 331 OF THE BANKRUPTCY CODE,
BANKRUPTCY RULE 2016(a), AND LOCAL BANKRUPTCY RULE 2016-1
ESTABLISHING PROCEDURES GOVERNING
INTERIM MONTHLY COMPENSATION**

PLEASE TAKE NOTICE that upon the Motion of Irving H. Picard, as trustee

(the “Trustee”) for the substantively consolidated estate of Bernard L. Madoff Investment Securities LLC (“BLMIS”) and Bernard L. Madoff, for entry of an order further amending, solely as it relates to Windels Marx Lane & Mittendorf, LLP (“Windels Marx”), that certain Order Pursuant to Section 78eee(b)(5) of SIPA, Sections 105, 330, and 331 of the Bankruptcy Code, Bankruptcy Rule 2016(a), and Local Bankruptcy Rule 2016-1 Establishing Procedures Governing Interim Monthly Compensation of the Trustee and Baker & Hostetler LLP, as most recently amended and superseded in its entirety on June 1, 2011, the undersigned will present the attached proposed Order to the Honorable Burton R. Lifland, United States Bankruptcy Judge, for entry on **November 21, 2011 at 12:00 p.m.**;

PLEASE TAKE FURTHER NOTICE that objections to the Motion (“Objections”), if any, must be in writing, shall conform to the Bankruptcy Rules and the Local Rules of the Bankruptcy Court, and shall be filed in accordance with General Order M-399 and the electronic filing procedures for the United States Bankruptcy Court for the Southern District of New York (available at www.nysb.uscourts.gov), with a courtesy copy delivered to the Chambers of the Honorable Burton R. Lifland, and shall be served upon (a) Baker & Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, NY 10111, Attn: David J. Sheehan, Esq., (b) the Securities Investor Protection Corporation, 805 Fifteenth Street, NW, Suite 800, Washington, D.C. 20005, Attn: Kevin H. Bell, Esq., and (c) Windels Marx Lane & Mittendorf, LLP, 156 West 56th Street, New York, New York 10019, Attn: Alan Nisselson, Esq., so as to be received no later than **November 21, 2011 at 11:00 a.m.**

PLEASE TAKE FURTHER NOTICE that in the event any Objections are timely filed and served, a hearing may be held before the Honorable Burton R. Lifland, United States Bankruptcy Judge, at a date to be scheduled by the Court. Upon such additional notice as the Court may direct, the moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in the relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE that, unless Objections are timely filed and served, the proposed Order may be signed without a hearing.

Dated: New York, New York
November 9, 2011

Respectfully submitted,

s/David J. Sheehan

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